

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

Ashley Cavazos, individually and on behalf
of all others similarly situated,
Plaintiff,

Case No. 1:18-CV-00011
Hon. Robert J. Jonker

v.
PARKWAY TROPICS, a Domestic Profit
Corporation and EDWARD SAYFIE a/k/a JR,
an individual jointly and severally,
Defendants.

AVANTI LAW GROUP, PLLC
Robert Anthony Alvarez (P66954)
Agustin Henriquez (P79589)
Attorneys for Plaintiff
600 28th St. SW
Wyoming, MI 49509
(616) 257-6807
ralvarez@avantilaw.com

JACKSON LEWIS, PC
Allan S. Rubin (P44420)
Attorney for Defendants
2000 Town Center, Suite 1650
Southfield, MI 48532
(248) 936-1930
rubina@jacksonlewis.com

JOINT MOTION FOR APPROVAL OF CONFIDENTIAL AGREEMENT

The parties, through their counsel, respectfully request the Court enter its Order approving the agreement reached by the parties in this matter. In support, the parties state as follows:

1. This Joint Motion is filed pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201-219.
2. Defendants deny liability and contend that the Plaintiff was not an employee, and not entitled to wages in the first instance. However, the parties reached a compromise agreement on October 26, 2018 resolving all claims between them in this case 1:18-cv-11.

3. On January 5, 2018 Plaintiff filed Collective and Class Action Complaint alleging violations of the Fair Labor Standards Act and the Michigan Workforce Opportunity Wage Act.
4. On March 19, 2018, Defendants filed a Motion to Dismiss Plaintiff's Complaint and/or Stay Proceedings Pending Arbitration.
5. A hearing was held on May 29, 2018 regarding Defendants' Motion to Dismiss Plaintiff's Complaint and/or Stay Proceedings Pending Arbitration.
6. On May 29, 2018, the Court issued an Order granting a stay in the proceedings pending arbitration.
7. Since the Order, parties have negotiated and were able to reach a settlement on October 26, 2018.
8. The settlement reached is based on a full understanding by the parties of their respective positions and the risk/benefits to concluding this action as compared to continuing the action.
9. The parties urge the Court to find that the proposed settlement is fair, reasonable and adequate and enter its Order authorizing the same. The parties file their Brief In Support in conjunction with this Joint Motion.

THE PARTIES, by their undersigned counsel, respectfully request the Court enter its Order authorizing the settlement in this case, and for all other appropriate relief.

Respectfully Submitted,

Dated: November 6, 2018

By: Robert Anthony Alvarez.
Robert Anthony Alvarez (P66954)
AVANTI LAW GROUP, PLLC
Counsel for Plaintiff
600 28th Street SW
Wyoming, MI 49509
(616) 257-6807
ralvarez@avantilaw.com

By: /s/ Allan S. Rubin
Allan S. Rubin (P44420)
JACKSON LEWIS
Counsel for Defendant
2000 Town Center, Ste. 1650
Southfield, MI 48075
(248) 936-1900
rubina@jacksonlewis.com